

EXHIBIT B

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DISTRICT

JAMAAL CAMERON; RICHARD
BRIGGS; RAJ LEE; MICHAEL
CAMERON; MATTHEW
SAUNDERS, individually and on
behalf of all others similarly situated,

Case 2:20-cv-10949-LVP-MJH

Plaintiffs,

v.

MICHAEL BOUCHARD, in his
official capacity as Sheriff of Oakland
County; CURTIS D. CHILDS, in his
official capacity as Commander of
Corrective Services; OAKLAND
COUNTY, MICHIGAN,

Defendants.

AFFIDAVIT OF SERGEANT RYAN TERRY

SERGEANT RYAN TERRY, being first duly sworn, deposes and states:

1. That this Affidavit is made of my own personal knowledge and that if I am sworn to testify, I can give competent testimony of my own personal knowledge in support of each paragraph of this Affidavit regarding conditions at the East Annex.

2. That I have been employed by the Oakland County Sheriff's Office since 2011. At all times relevant to the instant action I have worked as a Sergeant in the East Annex of the Oakland County Jail since August 2019.
3. The East Annex is a dormitory style correction facility which provides each inmate with freedom of movement around their assigned dorm. The Annex is divided into an East and West dormitory. All inmates in the West dormitory are trusties.
4. With regard to food preparation, on April 10, 2020, all food preparation was moved to the East Annex as a result of COVID-19 issues with the jail's food vendor, Aramark. In the East Annex, all trusties working in food preparation wear gloves and masks. All food preparation surfaces are disinfected after each meal.
5. No one is allowed to access the food prep room unless they are assigned to that detail.
6. With regard to soap, bar soap is available to all inmates upon request at the dorm officer's desk and is available at sinks within the East Annex for handwashing.
7. With regard to reclassification of inmates, inmates are not moved or reclassified under threat. Supervisors in the East Annex only move inmates as a result of rule violations, classification changes or health and safety issues.

No inmate was ever classified back to the main jail from the East Annex from “suspicion of exposure to COVID-19”.

8. With regard to inmate laundry which is performed in the East Annex, COVID-19 laundry is segregated from non-COVID-19 laundry. All trustees working in the laundry wear gloves. Masks are also available to all inmates in the East Annex. Inmates performing laundry services are allowed multiple clothing changes per day.
9. With regard to personal protective equipment for corrections staff, deputies always wear gloves when touching with inmates. All deputies have access to masks to be worn at their discretion.
10. With regard to disinfectant, all inmates in the West dorm of the East Annex have a key available to them to the supply room where the DMQ disinfectant is stored. They are responsible for cleaning their bunk areas and have access to DMQ at all times. With regard to the East dorm, disinfectant is available to inmates by request from the dorm deputy at all times.
11. With regard to medical call slips, medical call slips are readily available in the East Annex to any inmate who wants one.
12. With regard to assessing COVID-19, deputies take the temperature of every inmate twice per shift/six (6) times per day.

13. With regard to cleaning showers and bathrooms, they are cleaned daily by trusties using the DMQ disinfectant.

I declare under penalty of perjury, under 28 U.S.C. § 1746, that the foregoing is true and correct.

Further, Affiant sayeth not.

Dated: April 19, 2020

/s/Sergeant Ryan Terry

SERGEANT RYAN TERRY

*consent for signing given telephonically

Due to the COVID-19 crisis, it was not possible to obtain a written signature on the above Affidavit. I am an attorney admitted to the Eastern District of Michigan. On April 19, 2020, I personally spoke with SERGEANT RYAN TERRY and read this Affidavit to him. SERGEANT RYAN TERRY told me that the information in the above Affidavit is true, and gave me verbal consent to sign on his behalf.

I declare under penalty of perjury, under 28 U.S.C. § 1746, that the foregoing is true and correct.

/s/Steven M. Potter (P33344)

Steven M. Potter (P33344)

Attorney for Defendants